

**IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HERBERT and DORIS STEELE, ERIC R.)
CHAVEZ, ALEXANDRA DIAZ AND)
SONIA TORRES, on behalf of themselves and)
all others similarly situated,) No. 1:08-cv-1880
)
Plaintiffs,) Judge Blanche M. Manning
vs.)
)
GE MONEY BANK, a federal savings bank;)
WMC MORTGAGE CORPORATION and)
WMC MORTGAGE, LLC)

**JOINT MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**

All parties to this dispute, by their undersigned attorneys, hereby respectfully request pursuant to Rule 6 of the Federal Rules of Civil Procedure an extension of time until July 2, 2008, for the date by which defendants must answer or otherwise respond. In support of this motion, the parties state as follows:

1. On April 1, 2008, plaintiffs HERBERT and DORIS STEELE, ERIC R. CHAVEZ, ALEXANDRA DIAZ AND SONIA TORRES, on behalf of themselves and all others similarly situated (collectively "STEELE") filed an Amended Class Action Complaint ("Complaint") in this Court.
2. Plaintiffs perfected service on WMC Mortgage LLC, formerly WMC Mortgage Corp., ("WMC") on April 28, 2008. WMC must answer or otherwise respond to the amended complaint within 20 days of service, making the deadline for WMC's answer or responsive pleading May 19, 2008.
3. In a telephone call on May 19, 2008, defense counsel communicated to plaintiffs' counsel that counsel for defendant GE Money Bank ("GEMB") had agreed to

accept service on behalf of its client. GEMB's responsive pleading thus would be due on or about June 9, 2008.

4. In preparation for this Court's scheduled May 20, 2008 status conference, counsel for the parties discussed service and pleading deadlines. The parties agree that all parties now have been effectively served. The parties also agreed to coordinate the due dates for the responsive pleadings. The parties agree that all defendants shall be required to answer or otherwise respond by July 2, 2008.

WHEREFORE, the parties jointly and respectfully request that this Court issue an order setting July 2, 2008 as the date by which defendants must answer or otherwise respond to the complaint in this action.

Dated: May 19, 2008

Respectfully submitted,

Counsel for Plaintiffs	Counsel for WMC
/s Al Hofeld, Jr. with consent Al Hofeld, Jr. Law Offices of Al Hofeld, Jr., LLC 208 S. LaSalle Street, Suite #1650 Chicago, IL 60604	/s James L. Thompson James L. Thompson - 6199621 Justin C. Steffen JENNER & BLOCK, LLP 330 N. Wabash Avenue Chicago, IL 60611 Telephone: (312) 222-9350 Facsimile: (312) 527-0484
Gary Klein Roddy Klein & Ryan 727 Atlantic Ave, 2d Floor Boston, MA 02111	Counsel for GEMB
Andrew S Friedman Wendy J. Harrison Bonnett, Fairbourn, Friedman & Balint, P.C. 2901 North Central Avenue, Ste 1000 Phoenix, AZ 85012	/s Eric N. Macey with consent Eric N. Macey NOVACK & MACEY LLP 100 North Riverside Plaza Chicago, Illinois 60606 Telephone: (312) 419-6900 Facsimile: (312) 419-6928
Lori Ann Fanning Marvin Alan Miller Miller Law LLC 115 South LaSalle Street Suite 2910 Chicago, IL 60603	

CERTIFICATE OF SERVICE

I, James L. Thompson, hereby certify that a true and correct copy of the foregoing **Joint for Extension of Time to Answer or Otherwise Respond** was served via the CM/ECF system on May 19, 2008 to the following counsel of record:

Al Hofeld, Jr. Law Offices of Al Hofeld, Jr., LLC 208 S. LaSalle Street, Suite #1650 Chicago, IL 60604	Eric N. Macey NOVACK & MACEY LLP 100 North Riverside Plaza Chicago, Illinois 60606 Telephone: (312) 419-6900 Facsimile: (312) 419-6928
Gary Klein Roddy Klein & Ryan 727 Atlantic Ave 2nd Floor Boston, MA 02111	Lori Ann Fanning Marvin Alan Miller Miller Law LLC 115 South LaSalle Street Suite 2910 Chicago, IL 60603
Andrew S Friedman Wendy J. Harrison Bonnett, Fairbourn, Friedman & Balint, P.C. 2901 North Central Avenue Suite 1000 Phoenix, AZ 85012	

s/ James L. Thompson